

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

JERRY D. GOODWIN, Individually and On)	
Behalf of All Others Similarly Situated,)	
)	
Plaintiff,)	
)	
v.)	Civil Action No. 10 cv 04905 (PGG)
)	
ANADARKO PETROLEUM CORPORATION,)	ECF Case
JAMES T. HACKETT, ROBERT G. GWIN)	
and M. CATHY DOUGLAS,)	
)	
Defendants.)	
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SHIRLEY HARRIS, Individually and On)	
Behalf of All Others Similarly Situated,)	
)	
Plaintiff,)	
)	
v.)	
)	Civil Action No. 10 cv 05894 (UA)
ANADARKO PETROLEUM CORPORATION,)	
JAMES T. HACKETT, ROBERT G. GWIN)	
and M. CATHY DOUGLAS,)	
)	
Defendants.)	
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**NOTICE OF MOTION BY PENSION FUNDS INVESTORS' GROUP FOR
CONSOLIDATION OF RELATED ACTIONS, APPOINTMENT AS LEAD PLAINTIFF
AND APPROVAL OF ITS SELECTION OF LEAD COUNSEL**

TO: ALL PARTIES AND THEIR COUNSEL OF RECORD

PLEASE TAKE NOTICE that, upon the accompanying Memorandum of Law in Support of the International Union of Operating Engineers Pension Plan, Hallandale Beach Police Officers' and Firefighters' Personnel Retirement Fund and Miramar Police Officers' Retirement Pension Fund Plan and Trust Fund's (collectively, the "Pension Funds Investors' Group") Motion for Consolidation of Related Actions, Appointment as Lead Plaintiff, and Approval of its

Selection of Lead Counsel, and the Declaration of Patrick A. Klingman, together with referenced exhibits, filed herewith, proposed Lead Plaintiff, the Pension Funds Investors' Group, hereby moves this Court, the Honorable Paul G. Gardephe, United States District for the Southern District of New York, 500 Pearl Street, New York, New York, for an Order:

1. Consolidating all actions filed in the Southern District of New York which are related to the above-captioned class actions for all purposes, pursuant to Federal Rule of Civil Procedure 42(a); and

2. Pursuant to Section 21D(a)(3)(B) of the Securities Exchange Act of 1934, as amended by the Private Securities Litigation Reform Act of 1995, 15 U.S.C. § 78u-4(a)(3)(B), (i) appointing the Pension Funds Investors' Group as Lead Plaintiff for the proposed Class of Anadarko Petroleum Corporation investors; and (ii) approving the Pension Funds Investors' Group's selection of Shepherd, Finkelman, Miller & Shah, LLP, as Lead Counsel for the proposed Class.

Respectfully submitted,

Dated: August 23, 2010

SHEPHERD, FINKELMAN, MILLER & SHAH, LLP

/s Patrick A. Klingman

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**Attorneys for Movant,
The Pension Funds Investors' Group**

CERTIFICATE OF SERVICE

I hereby certify that on August 23, 2010, I filed the foregoing Notice of Motion for Consolidation of Related Actions, Appointment as Lead Plaintiff and Approval of the Pension Funds Investors' Group's Selection of Lead Counsel, together with supporting Memorandum of Law, Declaration and referenced exhibits, with the Clerk of Court using the Court's CM/ECF System which will send notification of such filing to all counsel of record.

s/ Patrick A. Klingman
Patrick A. Klingman (PK-3658)